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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 TRUSTEES OF THE NEVADA RESORT
12 ASSOCIATION - INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
13 EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE
14 UNITED STATES AND CANADA,
LOCAL 720, PENSION TRUST;
15 TRUSTEES OF THE NEVADA RESORT
ASSOCIATION - INTERNATIONAL
16 ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
17 MACHINE OPERATORS OF THE
UNITED STATES AND CANADA,
18 LOCAL 720, WAGE DISABILITY
TRUST; AND TRUSTEES OF THE
19 NEVADA RESORT ASSOCIATION -
INTERNATIONAL ALLIANCE OF
20 THEATRICAL STAGE EMPLOYEES
AND MOVING PICTURE MACHINE
21 OPERATORS OF THE UNITED STATES
AND CANADA, LOCAL 720,
22 APPRENTICE AND JOURNEYMAN
TRAINING AND EDUCATION TRUST,

23 Plaintiffs,

24 vs.

25 HARRAH'S LAS VEGAS, LLC f/k/a
HARRAH'S LAS VEGAS, INC., d/b/a
26 HARRAH'S LAS VEGAS, a Nevada
limited-liability company,

27 Defendant.
28

Case No. 2:13-cv-00040-APG-PAL

Consolidated with:

Case No.: 2-13-cv-00042-APG-PAL
Case No.: 2-13-cv-00043-APG-PAL
Case No.: 2-13-cv-00046-APG-PAL
Case No.: 2-13-cv-00047-APG-PAL

**JOINT MOTION AND ORDER TO
STAY CASE FOR THIRTY DAYS
PENDING SETTLEMENT
NEGOTIATIONS**

FLAMINGO LAS VEGAS OPERATING
COMPANY, LLC f/k/a PARK PLACE
ENTERTAINMENT CORPORATION
d/b/a FLAMINGO HILTON – LAS
VEGAS, a Nevada limited-liability
company,

Defendant.

DESERT PALACE, INC. d/b/a CAESARS
PALACE, a Nevada corporation,

Defendant.

PARIS LAS VEGAS OPERATING
COMPANY, LLC f/k/a PARBALL
CORPORATION d/b/a PARIS, LLC, a
Nevada limited-liability company,

Defendant.

PARBALL CORPORATION d/b/a
BALLY'S LAS VEGAS, a Nevada
corporation,

Defendant.

Consolidated Defendants Harrah's Las Vegas, LLC; Flamingo Las Vegas Operating Company, LLC; Desert Palace, Inc.; Paris Las Vegas Operating Company, LLC; and Parball Corporation (collectively "Consolidated Defendants") and Plaintiffs, Trustees Of The Nevada Resort Association - International Alliance Of Theatrical Stage Employees And Moving Picture Machine Operators Of The United States And Canada, Local 720, Pension Trust; Trustees Of The Nevada Resort Association - International Alliance Of Theatrical Stage Employees And Moving Picture Machine Operators Of The United States And Canada, Local 720, Wage Disability Trust; And Trustees Of The Nevada Resort Association - International Alliance Of Theatrical Stage Employees And Moving Picture Machine Operators Of The United States And Canada, Local 720, Apprentice And Journeyman Training And Education Trust ("Plaintiffs") by and through their respective counsel, jointly propose and move this Court to stay the proceedings and all deadlines in this case, including the Joint Pretrial Order due on January 4, 2016, and Defendants' response to Plaintiffs'

1 Motion for Summary Judgment which is due on January 11, 2016, for thirty (30) days pending the
2 Parties' settlement negotiations. In support of this motion, the Parties state as follows:

3 1. For a variety of reasons that are unimportant to this Joint Motion, the Parties to this
4 case were permitted to re-open the discovery period, which ultimately concluded on November 4,
5 2015. (Doc. No. 76.) During the re-opened discovery period, the Parties swiftly made their expert
6 disclosures, conducted two expert depositions and exchanged additional rounds of written discovery.
7

8 2. On December 4, 2015, Plaintiffs filed a Motion for Partial Summary Judgment.
9 (Doc. No. 78.) Plaintiffs agreed to Defendants' request for a two-week extension to file their
10 Opposition, which the Court granted. (Doc. Nos. 79-80.) Defendants' Opposition to Plaintiffs'
11 Motion for Partial Summary Judgment is currently due on January 11, 2015.
12

13 3. A Joint Pre-Trial Order is currently due on January 4, 2016. (Doc. No. 76.)

14 4. The Parties are now engaged in settlement negotiations. These negotiations have the
15 potential to resolve the case either partially or fully. If the Parties are not able to come to a complete
16 resolution, we anticipate that at least a partial resolution is likely, which would leave significantly
17 pared down issues for trial. In that event, the Joint Pre-Trial Order would change considerably from
18 one filed on January 4th.

19 5. The Parties agree that it would be advantageous to avoid incurring additional fees and
20 costs while attempting to resolve this case and, thus, are in agreement that a short stay of the case is
21 appropriate.
22

23 6. Accordingly, the Parties mutually agree that staying the case for a thirty-day period,
24 until February 3, 2016, will not unduly prejudice any party and will conserve resources, making
25 settlement more likely.

26 7. This request is not made for purpose of delay, but rather is intended to permit the
27 Parties' time and resources to be devoted toward finding a possible resolution to this matter.
28

1 WHEREFORE, for the reasons stated above, the Parties jointly move this Court to enter a
2 stay concluding on February 3, 2016, and hereby suspend all proceedings and deadlines in this case,
3 including the deadline for the Joint Pretrial Order on January 4, 2016, and Defendants' deadline to
4 respond to Plaintiffs' Motion for Partial Summary Judgment on January 11, 2016. If the Parties are
5 unable to resolve the case before that time, the new deadlines for both the Joint Pre-Trial Order and
6 Defendants' response to Plaintiffs' Motion for Partial Summary Judgment will be February 3, 2016.
7

8
9 Dated: December 31, 2015

Dated: December 31, 2015

10
11 THE URBAN LAW FIRM

LITTLER MENDELSON

12 By: /s/ Nathan R. Ring, Esq. _____
13 MICHAEL A. URBAN, ESQ.
14 NATHAN R. RING, ESQ.
15 SEAN MACDONALD, ESQ.

By: /s/ Rachel Silverstein, Esq. _____
RICK D. ROSKELLEY, ESQ.
RACHEL SILVERSTEIN, ESQ.

Attorneys for Defendants

Attorneys for Plaintiffs

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17 **IT IS SO ORDERED:**

18 Dated: January 15, 2016

19
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21 US District Judge/Magistrate Judge

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23 Firmwide:137802972.1 083558.1072
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